

**MEMO ENDORSED**

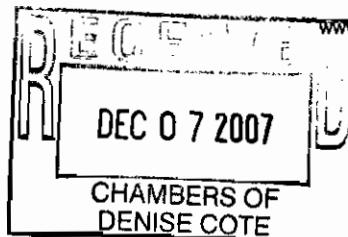
GEORGE B. FREEHILL  
 WILLIAM L. JUSKA, JR.  
 JAMES L. ROSS\*  
 ERIC E. LENCK  
 JOHN J. WALSH\*  
 PATRICK J. BONNER\*  
 PETER J. GUTOWSKI  
 MARI F. MULLER  
 WAYNE D. MEEHAN\*  
 DON P. MURNANE, JR.\*  
 THOMAS M. RUSSO  
 THOMAS M. CANEVARI\*  
 MICHAEL FERNANDEZ\*  
 JOHN F. KARPOUSIS\*  
 MICHAEL E. UNGER\*  
 WILLIAM J. PALLAS\*  
 GINA M. VENEZIA\*  
 LAWRENCE J. KAHN\*  
 BARBARA G. CARNEVALE\*  
 MANUEL A. MOLINA  
 JUSTIN T. NASTRO\*  
 PAMELA L. SCHULTZ\*  
 DANIEL J. FITZGERALD\*  
 MICHAEL C. ELLIOTT\*

\* ALSO ADMITTED IN NEW JERSEY  
 \* ALSO ADMITTED IN CONNECTICUT  
 \* ALSO ADMITTED IN WASHINGTON, D.C.  
 \* ALSO ADMITTED IN LOUISIANA

LAW OFFICES OF  
**FREEHILL HOGAN & MAHAR LLP**  
 80 PINE STREET  
 NEW YORK, N.Y. 10005-1759

TELEPHONE (212) 425-1900

FACSIMILE (212) 425-1901

E-MAIL: [reception@freehill.com](mailto:reception@freehill.com)[www.freehill.com](http://www.freehill.com)

NEW JERSEY OFFICE  
 850 BERGEN AVENUE  
 JERSEY CITY, N.J. 07306  
 TELEPHONE (973) 623-5514  
 FACSIMILE (973) 623-3813

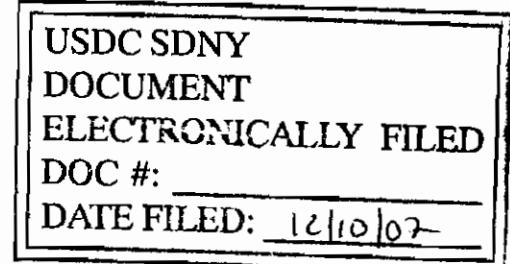
CONNECTICUT OFFICE  
 23 OLD KINGS HIGHWAY SOUTH  
 DARIEN, CT 06820-4538  
 TELEPHONE: (203) 921-1913  
 FACSIMILE (203) 358-8377

December 5, 2007

OUR REF: 402-07/PJG

Honorable Denise L. Cote  
 United States District Judge  
 Daniel Patrick Moynihan  
 United States Courthouse  
 500 Pearl Street, Room 1040  
 New York, NY 10007

Re: Americas Bulk Transport Ltd. v.  
 Volcano Shipping S.A.  
 07 Civ. 7996 (DLC)



Dear Judge Cote,

We represent the Plaintiff Americas Bulk Transport in the captioned action and write, with the consent of defense counsel, to seek a further adjournment on the pending motion filed by the defendants for countersecurity.

As outlined in our last correspondence, the parties have expressed a desire to try to resolve the claim through direct negotiations, and those negotiations continue. In view of this, and so as to conserve both client and judicial resources, the parties would like to continue to hold the present motion in abeyance to enable the parties some additional time to see whether the matter can be resolved on an amicable basis. Under these circumstances, we would respectfully propose that our opposition to the motion, if necessary, would be filed on or before December 13, 2007, and a reply submission on or before December 20, 2007.

Provided this meets with the Court's approval, we will proceed on this basis and we appreciate the Court's attention to the foregoing.

*Granted. There shall  
 be no further  
 extensions.*

*Denise Cote  
 December 10, 2007*

The Honorable Denise L. Cote  
December 5, 2007  
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Respectfully submitted,

FREEHILL HOGAN & MAHAR LLP  


Peter J. Gutowski

PJG:clc

cc: Blank Rome LLP  
Attn: Jack A. Greenbaum, Esq.  
Via Email: [jgreenbaum@blankrome.com](mailto:jgreenbaum@blankrome.com)